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FACEBOOK, INC.

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

14 FACEBOOK, INC.,

15 Plaintiff,

16 v.

17 POWER VENTURES, INC. a Cayman Island  
corporation, STEVE VACHANI, an individual;  
18 DOE 1, s/b/a POWER.COM, DOES 2-25,  
inclusive,

19 Defendants.  
20

Case No. 5:08-cv-05780-JW (JCS)

**FACEBOOK, INC.'S OMNIBUS  
MOTION FOR ADMINISTRATIVE  
RELIEF TO FILE UNDER SEAL,  
PURSUANT TO CIVIL LOCAL RULE  
79-5(D)**

Date: Courtroom 9, 19th Floor  
Judge: Hon. Chief Judge James Ware

Pursuant to Local Rules 7-11 and 79(5)(d), Plaintiff Facebook, Inc. (“Facebook”) submits this Administrative Motion for sealing order regarding: 1) portions of the Parties’ Joint Letter Regarding the Re-deposition of Power Ventures, Inc.; 2) portions of the Parties’ Joint Letter Regarding the Exclusion of Testimony at Trial of Power’s Former Brazilian Employees, or in the Alternative, the Production of Former Power employees for Deposition; 3) portions of the Parties’ Joint Letter Regarding Defendants’ Production of Company Emails and the Further Deposition of Defendant Power Ventures, Inc. at Defendants’ Expense; 4) Exhibit No. 2 attached to the Declaration of Morvarid Metanat in support of the Parties’ Joint Letter Regarding the Re-deposition of Power Ventures, Inc.; and 5) Exhibit Nos. A, B, D, E, F, G and H attached to the Declaration of Monte M.F. Cooper in support of the Parties’ Joint Letter Regarding Power Ventures, Inc.’s Trial Witnesses; and 6) Exhibit Nos. 1 and 2 attached to the Declaration of Monte M.F. Cooper in support of the Parties’ Joint Letter Regarding Power Ventures, Inc.’s Production of Employee Emails.

Defendants Power and Steve Vachani have designated the aforementioned materials, as “highly Confidential-Attorneys’ Eyes Only” pursuant to the parties’ Protective Order (Dkt. NO. 95). Facebook disagrees with these confidentiality designations and hereby lodges with the Clerk, pursuant to Civil L.R. 79-5(d), the aforementioned materials, pending this Court’s decision following the filing of Defendants’ Declaration (demonstrating good cause to seal these materials from the public record) and narrowly tailored proposed sealing order. Civil L.R. 79-5(d).

Dated: January 26, 2012

Orrick, Herrington & Sutcliffe LLP

By: /s/ Morvarid Metanat /s/  
MORVARID METANAT  
Attorneys for Plaintiff  
FACEBOOK, INC.